

EXHIBIT B

Deb:

Again a misstatement of the facts. You just filed a correction based on a 'mathematical error.' Also, you have known for weeks now by doing simple math what is not in dispute. Finally, you knowingly and intentionally refused to agree to an order in good faith that is in line with ECF 57, that can and will be addressed at another time.

You absolutely do not have standing to object to what, when and where Dr. Elder does with money he negotiated. As he told you yesterday, it is not of your concern who it is paid to, as I told you, it is paid to his PC because that is what he negotiated to be paid for. **You assume all responsibility for any tax or other consequences that may flow from you literally holding his money hostage. You have put Dr. Elder in a position to lose out on** business opportunity (because weeks of your delays and antics re his money) and **the potential loss of a tax benefit.** Again, Dr. Elder is having me attached your own order I seek for entry minus an address change, he is doing so only because he must mitigate his damages.

Time is of the essence. Let me know asap.

| Mo Abdrabboh, Esq.

| ABDRABBOH LAW AAAALAW

| 1360 Porter St. Suite 250 | Dearborn, MI 48124

| p.313.483.9453 or c.313.799.0173

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From: Deborah Gordon <dgordon@debgordonlaw.com>

Sent: Wednesday, April 21, 2021 10:04 AM

To: Mo A <mabdrabboh@hotmail.com>

Cc: kmogill@bignet.net <kmogill@bignet.net>; Elizabeth Marzotto Taylor <emt@debgordonlaw.com>; Molly Savage <msavage@debgordonlaw.com>; Sarah Gordon Thomas <sthomas@debgordonlaw.com>; Tanya Kurtz <tkurtz@debgordonlaw.com>

Subject: RE: Seeking Concurrence

Magistrate Judge Grand attempted to resolve this issue yesterday at two separate status conferences. He was unable to do so because of your position that the Clerk of the Court should disburse funds to a third party entity, not Dr. Elder. We stipulated to the disbursement to Dr. Elder yesterday and previously on April 9, 2021. You have our written stipulations.

Please send the language for our review as to the distribution you are seeking.

In that you will be filing under seal, immediately upon filing any motion please serve my office and Ken as you are required to do under the rule. In the past you have intentionally refused to serve me even after I contacted you and asked to have the papers sent.

Deborah Gordon
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From: Mo A <mabdrabboh@hotmail.com>
Sent: Wednesday, April 21, 2021 8:58 AM
To: Deborah Gordon <dgordon@debgordonlaw.com>; kmogill@bignet.net
Subject: Seeking Concurrence

I seek concurrence from both of you as I plan on filing an emergency motion to release Dr. Elder's undisputed portion of money [REDACTED] You have no basis ethically or legally to take such position otherwise, and even though you refuse to tell Dr. Elder how and what the [REDACTED] represents (ethical requirement) this can no longer be used as an issue. It shouldn't have been used to bootstrap in the first place, you were ordered by this court to engage in good faith and the rules of ethics you are both well versed, do not permit certain positions to be taken relating to expenses, former clients, conflicts, and undisputed money.

I need a response, I will be filing shortly.

| *Mo Abdrabboh, Esq.*
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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

AMIR KAKI, M.D., *an individual*,
and **MAHIR ELDER, M.D.**, *an individual*,

Plaintiffs,

vs.

Case No.: 20-cv-10004
Hon. Arthur J. Tarnow
Mag. David R. Grand

TENET HEALTHCARE CORPORATION,
et al.

FILED UNDER SEAL

Defendants.

STIPULATED ORDER TO DISBURSE

Pursuant to this Court's Order of March 31, 2021 (ECF No. 57, PageID.2174-79), whereby counsel for Ms. Gordon and Dr. Elder were directed to stipulate to amounts to which there is no dispute and as to which this Court shall order prompt distribution, the parties stipulate and the Court Orders as follows:

1. The Clerk of the Court shall pay [REDACTED] to the order of Dr. Mahir D. Elder, c/o MAF Law, 1360 Porter- Suite 200, Dearborn, MI 48124, Social Security Number [REDACTED]

2. The Clerk shall also disburse to Dr. Mahir D. Elder 62% of accrued interest, if any, as to the funds on deposit with the Clerk in this matter as of the date of payment of the [REDACTED]

IT IS SO ORDERED.

Dated: April ___, 2021

HON. DAVID R. GRAND
United States Magistrate Judge

STIPULATED AS TO FORM AND SUBSTANCE BY THE PARTIES:

Dated: April 22, 2021

/s/ Deborah Gordon
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Dated: April 22, 2021

/s/ Mohammed Abdrabboh
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Attorney for Plaintiff Dr. Mahir Elder, M.D.

Dated: April 22, 2021

/s/ Kenneth Mogill
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